FDA Summary

IntraCoil® Self-Expanding Peripheral Stent P000033

Introduction

- Non-clinical Performance
- Clinical Summary
- Panel Questions

Non-clinical Performance

- In Vitro Testing
- Biocompatibility Testing
- In Vivo (Animal) Testing

- Randomized Trial Stent versus PTA
 - Superiority Hypothesis
 - 25% decrease in restenosis with the IntraCoil Stent
 - 500 patient Sample Size

- Primary Endpoint
 - 9 month Restenosis
 (> 50% restenosis)
 - 9 month MACE (death, Q-wave MI, target lesion revascularization) rate

- Patient enrollment slow
- Study stopped early
- Majority of lesions treated ≤ 3cm
- Superiority hypothesis not demonstrated
- No significant safety concerns

- Subgroup of IntraCoil patients selected based on following criteria prior to stenting:
 - residual stenosis ≥ 50%

or

Grade C or greater dissection

- Pre-dilatation vs PTA
 - Fewer dilatations
 - Shorter dilatations
 - Lower dilatation pressure

- Compared to PTA control group
 - no differences in
 - adverse event rate
 - effectiveness

- Indications for use changed
 - •from:
 - primary stenting for occlusive disease
 - •to:

stenting for patients meeting the subgroup criteria

- Study Limitations:
 - Retrospectively selected test group
 - Relatively small sample size
 - Differences in dilatation technique

Panel Questions

Panel Question 1

1a. Please discuss the use of the suboptimal pre-dilatation classification as a surrogate for suboptimal results with PTA.

Panel Question 1 (cont.)

1b. Please discuss any expected differences in terms of clinical outcomes between patients with suboptimal predilatation and patients with suboptimal results from PTA.

Panel Question 1 (cont.)

1c. Please discuss whether there is adequate data for a primary stent indication.

If not, what additional information would be necessary to support a primary stent indication in the femoral and/or popliteal arteries.

Panel Question 2

2. Please discuss whether the clinical data are adequate to determine the safety and effectiveness of the IntraCoil Stent in the popliteal artery.

Panel Question 3

Product Labeling

3a. Please Comment on the INDICATIONS FOR USE section as to whether it identifies the appropriate patient population for treatment with this device.

Panel Question 3 (cont.)

Product Labeling

 3b. Please comment on the CONTRAINDICATIONS section as to whether there are conditions under which the device should not be used because the risk clearly outweighs any possible benefit.

Panel Question 3 (cont.)

Product Labeling

3c. Please comment on the WARNINGS/PRECAUTIONS section as to whether it identifies all potential hazards regarding device use.

Panel Question 3 (cont.)

Product Labeling

- 3d. Please comment on the OPERATOR'S INSTRUCTIONS as to whether it adequately describes how the device should be used to maximize benefits and minimize adverse events.
- 3e. Do you have any other recommendations regarding the labeling of this device?

Panel Question 4

4. Please identify and discuss the items that you believe should be contained in a physician's training program for this device.